1 JOSEPH J. WISEMAN, ESQ., CSBN 107403 WISEMAN LAW GROUP, P.C. 2 1477 Drew Avenue, Suite 106 Davis. California 95618 3 **Telephone:** 530.759.0700 Facsimile: 530.759.0800 Attorney for Defendant 5 YGNACĬA BRADFORD 6 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE EASTERN DISTRICT OF CALIFORNIA 9 SACRAMENTO DIVISION 10 11 UNITED STATES OF AMERICA, Case No. CR S 10-CR-0223 JAM 12 Plaintiff, 13 STIPULATION AND ORDER MODIFYING TERMS OF PRETIRAL VS. 14 RELEASE TO REMOVE **DEFENDANT FROM PRETRIAL** 15 SERVICES SUPERVISION YGNACIA BRADFORD, et. al. 16 Defendants. 17 18 IT IS HEREBY STIPULATED by the parties, the UNITED STATES OF 19 AMERICA, through undersigned counsel, Phillip A. Ferrari, Assistant U. S. Attorney, 20 and YGNACIA BRADFORD ("Bradford") through undersigned counsel, Joseph J. 21 Wiseman, that the conditions of Ms. Bradford's pretrial release be modified to remove 22 her from pretrial supervision by the Eastern District Pretrial Services. 23 **BACKGROUND** 24 On June 21, 2010, Ms. Bradford was arraigned on charges related to an alleged 25 mortgage fraud scheme and pleaded not guilty. 26 Ms. Bradford was released on \$100,000 unsecured bond. She was placed on pre-2.7 trial supervision. Since she lives in Oakland, California, the Pretrial Services Office in 28 the Northern District of California supervised her as a courtesy to the local Eastern

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District office. Michael R. Evans, Ms. Bradford's Pretrial Services Officer has advised that she has been compliant since under supervision.

On December 11, 2012, Ms. Bradford pleaded guilty to one count of violation of 18 U.S.C. § 4, misprision of felony, pursuant to a plea agreement. She was released on the same conditions of pre-trial release. Her sentencing hearing is now set for October 14, 2014.

It has now been more than **four years** since Ms. Bradford was placed on pretrial supervision and the parties are not aware of any issues with respect to Ms. Bradford's compliance during that time. Pretrial Services Officer Evans has indicated to the parties that he has no objection to the Court's removing Ms. Bradford from pretrial supervision. This is due to the fact that Ms. Bradford has successfully been on supervised release since June 2010; she initially self-surrendered; she has no prior criminal history; and she has appeared for every court appearance as ordered.

## **STIPULATION**

The United States of America, through its counsel, Phillip A. Ferrari and defendant, YGNACIA BRADFORD, through her counsel of record, Joseph J. Wiseman, upon the recommendation of Pretrial Services due to Ms. Bradford's record of compliance with the conditions of her pretrial release, stipulate that all conditions of Ms. Bradford's pretrial release and her supervision by Pretrial Services shall be terminated. It is understood by the parties that the unsecured appearance bond previously posted by Rosette Johnson and Michael Bradford shall remain in effect and the United States passport hereto surrendered by Ms. Bradford shall remain in the custody of the Court.

Dated: June 25, 2014

Respectfully submitted,

WISEMAN LAW GROUP, P.C.

By: \_\_\_/s/ Joseph J. Wiseman\_\_\_ JOSEPH J. WISEMAN

Attorney for YGNACIA BRADFORD

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1 Dated: June 25, 2014 Benjamin B. Wagner **United States Attorney** 2 By: /s/ Phillip A. Ferrari 3 PHILLIP A. FERRARI 4 Assistant U.S. Attorney 5 6 7 **ORDER** 8 UPON GOOD CAUSE SHOWN, and pursuant to the stipulation of the parties, IT 9 IS HEREBY ORDERED THAT the conditions of Defendant YGNACIA BRADFORD's 10 pretrial release be hereby modified so as to remove her from pretrial supervision 11 currently conducted through the Pretrial Services Office of the Eastern District of 12 California. All other conditions of release shall remain in effect. 13 14 Dated: September 26, 2014 /s/ John A. Mendez 15 JOHN A. MENDEZ United States District Court Judge 16 17 18 19 20 21 22 23 24 25 26 2.7 28